UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

IN RE:	
PRO LABOR II, INC./ACECO, L.L.C.	Case 05-RC-149858
Respondent, and	
CONSTRUCTION AND MASTER	
LABORERS' LOCAL UNION 11,	
LIUNA,	
P <u>etitioner.</u>	_

PETITIONER'S OPPOSITION TO ACECO, LLC'S REQUEST FOR REVIEW

The Petitioner, Construction and Master Laborers' Local Union 11, affiliated with the Laborers' International Union of North America, (hereinafter, the "Union" or "Local 11"), submits this opposition to ACECO, LLC's Request for Review of the Regional Director's Decision and Direction of Election in the instant case, issued on May 29, 2015, involving an election of the employees of ProLabor II, Inc.

ACECO's request for review should be denied because it fails to raise any compelling issues of law or policy. Moreover, ACECO's request for review fails to identify any mistake of law or any clear factual error made in the Regional Director's decision and direction of election. Rather, the RD's decision is fully supported by the findings and authorities made and cited in the decision. Based upon the authorities relied upon by the RD and the evidence in support of his findings of fact, ACECO's request for review should be denied.

June 22, 2015

Respectfully submitted,

/s/Brian J. Petruska

Brian J. Petruska

bpetruska@maliuna.org

General Counsel

Laborers' Mid-Atlantic Regional Organizing

Coalition

11951 Freedom Drive, Rm. 310

Reston, Virginia 20190

Tel:703-476-2538

Fax:703-860-1865

 $Attorney\ to\ Petitioner\ Construction\ \&\ Master$

Laborers' Local Union 11, LIUNA

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing OPPOSITION TO ACECO, LLC'S REQUEST FOR REVIEW was served on the parties identified below by Electronic mail:

Maurice Baskin, Esq. Littler Mendelson, P.C. 1150 17th Street, NW, Suite 900 Washington, DC 20036 MBaskin@littler.com Counsel to ACECO, LLC

Kim Monroe Pro Labor II 8309 Richmond Highway Alexandria, VA 22309 kimmonroe@hireprolabor.com

Charles Posner, Esq. Regional Director Region 5, NLRB 100 S. Charles St., 6th Floor Baltimore, Maryland 21201 charles.posner@nlrb.gov

> _/s/Brian J. Petruska Brian J. Petruska